

REMARKS

The Official Action mailed October 28, 2006, has been received and its contents carefully noted. This response is filed within three months of the mailing date of the Official Action and therefore is believed to be timely without extension of time. Filed concurrently herewith is a *Request for Continued Examination*. Accordingly, the Applicant respectfully submits that this response is being timely filed.

Initially, it is noted that the Applicant would like to discuss the present application with the Examiner in a telephonic interview. The Applicant's representative left a voice mail message for Examiner Dudek on October 30, 2006, in order to arrange a mutually agreeable time for the interview.

The Applicant notes with appreciation the consideration of the Information Disclosure Statements filed on December 19, 2003; February 4, 2004; February 14, 2006; and May 8, 2006.

A further Information Disclosure Statement is submitted herewith and consideration of this Information Disclosure Statement is respectfully requested.

Claims 1-5, 9, 11, 13, 15 and 17 were pending in the present application prior to the above amendment. New independent claim 20 has been added to recite additional protection to which the Applicant is entitled. Accordingly, claims 1-5, 9, 11, 13, 15, 17 and 20 are now pending in the present application, of which claims 1 and 20 are independent. For the reasons set forth in detail below, all claims are believed to be in condition for allowance. Favorable reconsideration is requested.

The Official Action rejects claims 1-4, 9, 11, 13, 15 and 17 as obvious based on the combination of U.S. Patent Application Publication No. 2001/0022644 to Hinata and U.S. Patent No. 5,148,301 to Sawatsubashi. The Applicant respectfully traverses the rejection because the Official Action has not made a *prima facie* case of obviousness.

As stated in MPEP §§ 2142-2143.01, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available

to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. Obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art. "The test for an implicit showing is what the combined teachings, knowledge of one of ordinary skill in the art, and the nature of the problem to be solved as a whole would have suggested to those of ordinary skill in the art." In re Kotzab, 217 F.3d 1365, 1370, 55 USPQ2d 1313, 1317 (Fed. Cir. 2000). See also In re Fine, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988); In re Jones, 958 F.2d 347, 21 USPQ2d 1941 (Fed. Cir. 1992).

The prior art, either alone or in combination, does not teach or suggest all the features of the independent claims. Independent claim 1 recites that a thin film integrated circuit and a display device are covered and sealed with a resin. New independent claim 20 recites a resin over a display device and a thin film integrated circuit. Hinata and Sawatsubashi, either alone or in combination, do not teach or suggest the above-referenced features of the present invention.


The Official Action concedes that Hinata does not teach "the circuit and display device covered [and] sealed with the resin" (page 2, Paper No. 20060721). The Official Action asserts that Sawatsubashi "teaches covering the circuit and display [with] a resin resin 108 for protecting the integrated circuits" (Id.). The Applicant respectfully disagrees and traverses the above-referenced assertions in the Official Action. The seal member 108 of Sawatsubashi (shown in Figure 4) does not cover a liquid crystal display device. Therefore, even if one were sufficiently motivated to combine Hinata and Sawatsubashi, the combination still would not result in a thin film integrated circuit and a display device covered with a resin:

Since Hinata and Sawatsubashi do not teach or suggest all the claim limitations, a *prima facie* case of obviousness cannot be maintained. Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a) are in order and respectfully requested.

New independent claim 20 has been added to recite additional protection to which the Applicant is entitled. For the reasons stated above and already of record, the Applicant respectfully submits that new claim 20 is in condition for allowance.

Should the Examiner believe that anything further would be desirable to place this application in better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,



Eric J. Robinson
Reg. No. 38,285

Robinson Intellectual Property Law Office, P.C.
PMB 955
21010 Southbank Street
Potomac Falls, Virginia 20165
(571) 434-6789